

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY
20
21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Janet Trost, Esq.
24 501 S. Rancho Drive
25 Suite H-56
26 Las Vegas, Nevada 89106

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

US BANK, NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE
INSURANCE COMPANY et al.,

Defendants.

Case No.: 2:19-CV-00584-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF FIDELITY NATIONAL
TITLE INSURANCE COMPANY'S
MOTION TO DISMISS (ECF No. 40)**

[SECOND REQUEST]

COME NOW defendant Fidelity National Title Insurance Company ("Fidelity") and plaintiff U.S. Bank National Association ("U.S. Bank") (jointly, "Parties"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On November 4, 2022, U.S. Bank filed its first amended complaint in the United

1 States District Court, District of Nevada;

2 2. On December 5, 2022, Fidelity moved to dismiss U.S. Bank's first amended
3 complaint (ECF No. 40);

4 3. On January 18, 2023, U.S. Bank filed its response to Fidelity's motion to dismiss
5 (ECF No. 52);

6 4. On January 25, 2023, the Court granted the parties' first stipulation to extend the
7 time for Fidelity to file its reply (ECF No. 54), setting a deadline to reply of February 27, 2023;

8 5. Counsel for Fidelity are requesting a 14-day extension of its deadline to file its
9 reply supporting its motion to dismiss, through and including Monday, March 13, 2023, to afford
10 Fidelity additional time to respond to the arguments advanced by U.S. Bank.

11 6. Counsel for U.S. Bank does not oppose the requested extension;

12 7. This is the second request for an extension made by counsel for Fidelity, which is
13 made in good faith and not for the purposes of delay.

14 **IT IS SO STIPULATED** that Fidelity's deadline to file its reply to its motion to dismiss
15 is hereby extended through and including March 13, 2023.

16 Dated: February 16, 2023

SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair

18 KEVIN S. SINCLAIR

Attorneys for Defendant

19 FIDELITY NATIONAL TITLE INSURANCE
COMPANY

20 Dated: February 16, 2023

WRIGHT, FINLAY & ZAK, LLP

21 By: /s/-Lindsay D. Dragon

22 LINDSAY D. DRAGON

Attorneys for Plaintiff

23 U.S. BANK, NATIONAL ASSOCIATION

24 **IT IS SO ORDERED.**

25 Dated February 21, 2023

26 
27 THE HON. JAMES C. MAHAN
28 UNITED STATES DISTRICT JUDGE